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6 Attorneys for Plaintiff iii-Interactive LLC
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

10 III-INTERACTIVE LLC, A
11 MISSOURI LIMITED LIABILITY
12 COMPANY, D/B/A DIVISION-D,

13 Plaintiff,
14 vs.
15

16 VIDROLL, LLC, A DELAWARE
17 LIMITED LIABILITY COMPANY,
18
Defendant

Case No.

COMPLAINT FOR:

(1) BREACH OF CONTRACT

DEMAND FOR JURY TRIAL

1 Plaintiff iii-Interactive LLC, d/b/a Division-D (“Division-D”) hereby alleges
 2 as follows:

3 **JURISDICTION**

4 1. Plaintiff Division-D is a Missouri limited liability company. Division-
 5 D’s principal place of business is in Missouri. Division-D is a citizen of the State of
 6 Missouri and nowhere else.

7 2. Defendant VidRoll, LLC (“VidRoll”) is a Delaware limited liability
 8 company. VidRoll’s principal place of business is 3110 Main St., Santa Monica,
 9 California 90405 in the Central District of California. VidRoll is a citizen of the
 10 States of Delaware and California and nowhere else.

11 3. This Court has diversity jurisdiction over the parties pursuant to 28
 12 U.S.C. §1332 because the parties are citizens of different states, and the amount in
 13 controversy exceeds \$75,000. Plaintiff claims \$246,130.41 in actual damages.

14 4. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b)(1) &
 15 (b)(2) as the only defendant resides in the Central District of California and a
 16 substantial part of the events or omissions giving rise to Division-D’s claims
 17 occurred in the Central District of California.

18 **BACKGROUND OF DIVISION-D**

19 5. As is relevant to this case, Division-D places advertisements for its
 20 clients on websites and other electronic platforms.

21 6. Division-D fronts the money for the costs of advertisements for its
 22 clients. This means that Division-D pays sites such as Google and YouTube to run
 23 its clients’ advertisements and then in turn Division-D bills its clients for
 24 reimbursement of the advertising costs Division-D incurred. If a client does not pay
 25 Division-D, Division-D loses every dollar spent on running the advertisements.

26 **THE CONTRACT BETWEEN DIVISION-D AND VIDROLL**

27 7. In or about January 2016, VidRoll contracted for Division-D to run
 28 video advertisements for VidRoll on digital platforms. On or about January 13,

1 2016, VidRoll and Division-D each executed a written order agreement in which
 2 Division-D agreed to provide its services for VidRoll in exchange for monetary
 3 payments. This agreement is attached as Exhibit 1 (the “Insertion Order”).

4 8. Internet sites that display video advertisements, such as YouTube,
 5 generally charge advertisers for each time a video is displayed on a user’s screen.
 6 Each such display is known as an “impression.” Based on certain factors, including
 7 the prominence of how the video is displayed and the expected demographics of
 8 viewers, sites charge the advertiser different amounts for each impression.

9 9. Under the agreement between Division-D and VidRoll, VidRoll agreed
 10 to pay Division-D set amounts for each impression of a VidRoll video. The amount
 11 Division-D charged VidRoll per impression depended on the cost of that impression.

12 10. Through e-mail correspondence, VidRoll instructed Division-D what
 13 types of advertisements to place at various cost levels and updated the “Campaign
 14 and Media Details” (referring to the “Campaign and Media Details” in the Insertion
 15 Order). Based on the agreement and VidRoll’s instructions, Division-D began
 16 placing online advertisements for VidRoll in January 2016 and placed such ads until
 17 February 2017. Division-D has always followed VidRoll’s instructions, and
 18 Division-D has always performed all of its obligations under the agreement.

19 11. As agreed, Division-D paid internet sites and other platforms to run
 20 VidRoll’s videos. Division-D absorbed all costs. Division-D then billed VidRoll
 21 based on the number and costs for each type of impression. VidRoll never disputed
 22 any amount that Division-D billed VidRoll. VidRoll agreed to pay all invoices that
 23 Division-D issued.

24 12. In fact, VidRoll kept track of the impression data and would send
 25 reports to Division-D detailing how much Division-D should invoice VidRoll for
 26 that month. Division-D’s invoices were predicated on VidRoll’s data.

27 13. Starting with the October 2016 invoice, VidRoll stopped paying in full
 28 the amounts that Division-D invoiced VidRoll, pursuant to the agreement and

1 services Division-D provided, even though there was no dispute regarding the
2 amounts of these invoices.

3 14. There is no dispute between the parties that Division-D performed the
4 services for which it billed, and these invoices were predicated on VidRoll's reports
5 on how much Division-D should charge VidRoll.

6 15. In fact, VidRoll confirmed to Division-D that VidRoll owed Division-
7 D the invoiced amounts and agreed to pay them. But VidRoll has failed to pay.

8 16. Exhibit 2 contains Division-D's invoices of VidRoll from October
9 2016 through February 2017 which reflect the amounts that VidRoll owes Division-
10 D under their agreement. These invoices are predicated on the amounts that VidRoll
11 reported it owes to Division-D.

12 17. The October 2016 through February 2017 invoices totaled \$293,741.62.
13 VidRoll has only made three partial payments of \$22,552.88, \$16,506, and
14 \$8,552.33, totaling \$47,611.21, towards the October 2016 through February 2017
15 invoices. Thus, VidRoll has not paid Division-D the \$246,130.41 currently owed
16 under the agreement. The last partial payment that VidRoll made was made on the
17 first week of March 2017.

18. As a result, Division-D is out of pocket tens of thousands of dollars for
19. placing and paying for advertisements for VidRoll with no reimbursement.

FIRST CAUSE OF ACTION

(Breach of contract)

(Division-D against VidRoll)

23 19. Plaintiff restates and incorporates by reference each of the foregoing
24 paragraphs.

25 20. As alleged above, on or about January 13, 2016, Division-D and
26 VidRoll each agreed for Division-D to provide advertising placement services for
27 agreed upon financial compensation. Division-D has provided VidRoll all services

1 required of Division-D under the agreement, and Division-D has fully performed its
2 obligations.

3 21. In a material breach of the agreement, VidRoll has failed to pay
4 Division-D the \$246,130.41 that VidRoll presently and immediately owes Division-
5 D under their agreement.

6 **WHEREFORE**, Plaintiff prays for judgment as follows:

- 7 1. That judgement be entered in favor of Plaintiff
8 2. That Plaintiff be awarded \$246,130.41 in actual damages;
9 3. That Plaintiff be awarded its costs;
10 4. That Plaintiff be awarded all statutory interest allowed; and
11 5. That the Court award such other relief as it deems just and proper.

12 Dated: June 26, 2017

RAINES FELDMAN LLP

14
15 By: /s/ Scott M. Lesowitz
16 SCOTT M. LESOWITZ
17 Attorneys for Plaintiff iii-Interactive LLC

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DEMAND FOR JURY TRIAL

Pursuant to Rules 38(b) of the Federal Rules of Civil Procedure and Local Rule 38-1, Plaintiff hereby demands a jury trial to the greatest extent permitted by law.

6 | Dated: June 26, 2017

RAINES FELDMAN LLP

By: /s/ Scott M. Lesowitz

SCOTT M. LESOWITZ

Attorneys for Plaintiff iii-Interactive LLC

EXHIBIT 1



Insertion Order

Date: 1/13/2016

VidRoll Contact Details

Partner Name: VidRoll, LLC.
Company Address: 3110 Main St.
City: Santa Monica, CA
Zip: 90405
Country: USA

Account Contact: Scott Stevenson
Email: scott@vidroll.com
Phone: 303.246.5711
Billing Contact: Kristen Hester
Email: accounting@vidroll.com
Phone: 914.806.0271

Partner Information

Partner Name: Division D
Company Address: 906 Rain Forest Parkway
City: Columbia, MO
Zip: 65202
Country: USA

Account Contact: Jingjing Sha
Email: jingjing@divisiond.com
Phone: 573-446-7334
Billing Contact: Caleb Boeckman
Email: caleb@divisiond.com
Phone:

Insertion Order Details

IO Number	Currency	USD
	Total Budget	OPEN

Campaign & Media Details

Product	Campaign	Countries	Model	Rate	Currency
VAST/VPAID	DivisionD - US - \$4, \$5, \$7	US	CPM	Varied	USD
VAST/VPAID	DivisionD - UK - S - \$5	UK	CPM	\$5	USD
VAST/VPAID	DivisionD - UK - M/L - \$6.50	UK	CPM	\$6.50	USD

Payment Terms

Term: Net 60

Additional Comments

- By signing this document I agree that I will not run VidRoll's ads on fraudulent or fake traffic generated by bots, incentivized traffic, malware, spyware or non-approved URLs. I will not be paid for any impressions or clicks run on this type of traffic.
- Ads must not appear before, after, or next to any inappropriate content such as nudity or violent content
- VidRoll shall provide daily reporting/portal access for revenue and impressions.
- Reporting and billing is based off VidRoll's AdServers
- Impression levels and CPMs can be adjusted through email confirmation.



- Modifications of an IO shall be binding if made, acknowledged and accepted in writing (fax, letter, email) by an authorized representative of the parties.
- Either party may cancel this IO at any time with a 72 hour written notice (fax, letter, email). For example, if VidRoll cancels this IO, VidRoll shall only be responsible for the previously delivered impressions and revenue.
- VidRoll may make payments only when an outstanding balance exceeds \$50 for Check/ACH, \$200 for domestic & International wires

Send Wire To

Bank Name: Commerce Bank

Account Number: 400678661

Bank Address: 901 E. Broadway

Routing Number: 101000019

Bank City: Columbia, MO

IBAN:

Bank Country: US

Swift Code: CBKCUS44

Conditions

Except as otherwise specified, this Agreement is governed by version 3.0 of the AAA / IAB Standard Terms and Conditions ("Standard Terms") including the indemnification obligation provided therein. With respect to this Agreement, Advertiser (as defined herein) shall be interpreted as being "Ad Agency" (as the case may be) as defined in the Standard Terms and PUBLISHER shall be interpreted as being "Media Company" as defined in the Standard Terms except for those obligations, which reasonably can only be met by Media Company's publisher clients. The Standard Terms are hereby incorporated herein by reference:

http://www.iab.net/media/file/IAB_4As-tsandcs-FINAL.pdf

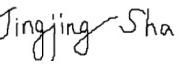
ACCEPTED AND AGREED:

VidRoll, LLC.

By: 

Name: **Scott Stevenson**
Title: **Director, Business Development**
Date ("Effective Date"): **2/24/16**, 2015

Partner

By: 

Name Jingjing Sha
Title Director of Business Operations
Date ("Effective Date"): **2/23**, 2015

EXHIBIT 2



906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083



INVOICE

102554

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
2015-0394	1/13/16	October	KE	Net 60	10/31/2016	1/14/2017
Quantity	Creative	Description			Rate	Cost
0.265	Mobile Preroll	Division-D_US_MW_\$2.50			2.50	0.66
47.484	Mobile Preroll	Division-D_US_In-App_\$2.25			2.25	106.84
0.022	Mobile Preroll	Division-D_US_MW_\$2.50 WL			2.50	0.06
4,393.309	Pre-roll	DivisionD - \$9 - ENG (v2)			9.00	39,539.78
6,859.889	Pre-roll	DivisionD - \$8 - M/L - ENG			8.00	54,879.11
1,843.004	Pre-roll	DivisionD - \$7 - ENG			7.00	12,901.03
1,631.428	Pre-roll	DivisionD - M/L - \$9 - ENG (WL)			9.00	14,682.85
901.572	Pre-roll	DivisionD - \$6.50 - M/L - ENG			6.50	5,860.22
523.458	Pre-roll	DivisionD - \$6 - ENG			6.00	3,140.75
156.517	Pre-roll	DivisionD - \$9 - M/L - ENG			9.00	1,408.65
87.202	Pre-roll	DivisionD - \$6 - ENG (WL)			6.00	523.21
77.411	Pre-roll	DivisionD - \$8.50 - M/L - ENG (WL)			8.50	657.99
41.577	Pre-roll	DivisionD - M/L - \$8 - ENG (WL)			8.00	332.62
7.536	Pre-roll	DivisionD - \$5 - ENG			5.00	37.68
68.158	Pre-roll	DivisionD - \$7.50 - M/L - ENG (WL)			7.50	511.19
71.174	Pre-roll	DivisionD - M/L - \$7 - ENG (WL)			7.00	498.22
7.581	Pre-roll	DivisionD - M/L - \$9.50 - ENG (WL)			9.50	72.02
		IO#: 1/13/16 Campaign Name: VidRoll Preroll Flight Dates: 1/13/16-TBD Billing Data: VidRoll's Ad Server Sales Rep: Katie Duff Billing Range: 10/1-10/31/16				

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total	\$135,152.88
Payments/Credits	-\$22,552.88
Balance Due in USD	\$112,600.00



906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083



INVOICE

102998

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
2015-0394	1/13/16	November	KE	Net 60	11/30/2016	2/13/2017
Quantity	Creative	Description			Rate	Cost
0.138	Mobile Preroll	Division-D_US_MW_\$2.50			2.50	0.35
122.109	Mobile Preroll	Division-D_US_In-App_\$2.00			2.00	244.22
78.555	Mobile Preroll	Division-D_US_In-App_\$2.25			2.25	176.75
0.46	Mobile Preroll	Division-D_US_MW_\$2.50 WL			2.50	1.15
1.182	Mobile Preroll	Division-D_US_MW_\$2.00			2.00	2.36
1,097.765	Pre-roll	DivisionD - \$9 - ENG (v2)			9.00	9,879.89
444.281	Pre-roll	DivisionD - \$7 - ENG			7.00	3,109.97
1,907.38	Pre-roll	DivisionD - M/L - \$9 - ENG (WL)			9.00	17,166.42
189.789	Pre-roll	DivisionD - \$6.50 - M/L - ENG			6.50	1,233.63
135.342	Pre-roll	DivisionD - \$6 - ENG			6.00	812.05
26.663	Pre-roll	DivisionD - \$9 - M/L - ENG			9.00	239.97
12.767	Pre-roll	DivisionD - \$6 - ENG (WL)			6.00	76.60
0.641	Pre-roll	DivisionD - \$8.50 - M/L - ENG (WL)			8.50	5.45
30.203	Pre-roll	DivisionD - M/L - \$8			8.00	241.62
7,354.394	Pre-roll	DivisionD - \$8 - M/L - ENG			8.00	58,835.15
7.921	Pre-roll	DivisionD - \$5 - ENG			5.00	39.61
606.292	Pre-roll	DivisionD - M/L - \$8 - ENG (WL)			8.00	4,850.34
94.146	Pre-roll	DivisionD - \$7.50 - M/L - ENG (WL)			7.50	706.10
43.17	Pre-roll	DivisionD - M/L - \$7 - ENG (WL)			7.00	302.19
117.152	Pre-roll	DivisionD - M/L - \$9.50 - ENG (WL)			9.50	1,112.94

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total

Payments/Credits

Balance Due in USD



DIVISION-D

906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083

INVOICE

102998

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
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2015-0394	1/13/16	November	KE	Net 60	11/30/2016	2/13/2017
Quantity	Creative	Description			Rate	Cost
		IO#: 1/13/16 Campaign Name: VidRoll Preroll Flight Dates: 1/13/16-TBD Billing Data: VidRoll's Ad Server Sales Rep: Katie Duff Billing Range: 11/1-11/30/16				

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total \$99,036.76

Payments/Credits -\$16,506.00

Balance Due in USD \$82,530.76



906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083



INVOICE

103323

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
2015-0394	1/13/16	December	KE	Net 60	12/31/2016	3/16/2017
Quantity	Creative	Description			Rate	Cost
0.013	Mobile Preroll	Division-D_US_MW_\$2.50			2.50	0.03
2.074	Mobile Preroll	Division-D_US_MA_\$2.25			2.25	4.67
0.017	Mobile Preroll	Division-D_US_MW_\$2.50 WL			2.50	0.04
2.64	Mobile Preroll	Division-D_US_MW_\$2.00			2.00	5.28
24.889	Mobile Preroll	Division-D_US_MA_\$2.00			2.00	49.78
463.802	Pre-roll	DivisionD - \$9 - ENG (v2)			9.00	4,174.22
145.735	Pre-roll	DivisionD - \$7 - ENG			7.00	1,020.15
1,252.107	Pre-roll	DivisionD - M/L - \$9 - ENG (WL)			9.00	11,268.96
51.274	Pre-roll	DivisionD - \$6.50 - M/L - ENG			6.50	333.28
0.547	Pre-roll	DivisionD - \$6 - ENG			6.00	3.28
0.468	Pre-roll	DivisionD - \$9 - M/L - ENG			9.00	4.21
1.007	Pre-roll	DivisionD - \$6 - ENG (WL)			6.00	6.04
0.87	Pre-roll	DivisionD - \$8.50 - M/L - ENG (WL)			8.50	7.40
3,615.912	Pre-roll	DivisionD - \$8 - M/L - ENG			8.00	28,927.30
1.538	Pre-roll	DivisionD - \$5 - ENG			5.00	7.69
280.348	Pre-roll	DivisionD - M/L - \$8 - ENG (WL)			8.00	2,242.78
7.935	Pre-roll	DivisionD - \$7.50 - M/L - ENG (WL)			7.50	59.51
2.297	Pre-roll	DivisionD - M/L - \$7 - ENG (WL)			7.00	16.08
324.737	Pre-roll	DivisionD - M/L - \$9.50 - ENG (WL)			9.50	3,085.00
12.282	Pre-roll	DivisionD_ML_\$8			8.00	98.26
0.001	Pre-roll	DivisionD_ENG_\$8.75			8.75	0.01

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total

Payments/Credits

Balance Due in USD



DIVISION-D

906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083

INVOICE

103323

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
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2015-0394	1/13/16	December	KE	Net 60	12/31/2016	3/16/2017
Quantity	Creative	Description			Rate	Cost
		IO#: 1/13/16 Campaign Name: VidRoll Preroll Flight Dates: 1/13/16-TBD Billing Data: VidRoll's Ad Server Sales Rep: Katie Duff Billing Range: 12/1-12/31/16				

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total \$51,313.97

Payments/Credits -\$8,552.33

Balance Due in USD \$42,761.64



906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083



INVOICE

103838

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
Quantity	Creative	Description			Rate	Cost
0.408	Mobile Preroll	DivisionD - mWeb - \$2 - US			2.00	0.82
0.247	Mobile Preroll	DivisionD - mApp - \$2 - US			2.00	0.49
420.225	Pre-roll	DivisionD - \$9 - ENG (v2)			9.00	3,782.03
203.497	Pre-roll	DivisionD - M/L - \$9.50 - ENG (WL)			9.50	1,933.22
28.672	Pre-roll	DivisionD - \$7 - ENG			7.00	200.70
59.981	Pre-roll	DivisionD - M/L - \$9 - ENG (WL)			9.00	539.83
30.561	Pre-roll	DivisionD - \$8 - M/L - ENG			8.00	244.49
8.038	Pre-roll	DivisionD - \$5 - ENG			5.00	40.19
1.052	Pre-roll	DivisionD - \$6.50 - M/L - ENG			6.50	6.84
0.011	Pre-roll	DivisionD - \$8.50 - M/L - ENG (WL)			8.50	0.09
2.144	Pre-roll	DivisionD - M/L - \$8 - ENG (WL)			8.00	17.15
0.767	Pre-roll	DivisionD - M/L - \$7 - ENG (WL)			7.00	5.37
0.907	Pre-roll	DivisionD - \$7.50 - M/L - ENG (WL)			7.50	6.80
0.705	Pre-roll	DivisionD - S - \$3.50 - ENG			3.50	2.47
0.71	Pre-roll	DivisionD - \$6 - ENG (WL)			6.00	4.26
0.759	Pre-roll	DivisionD - \$6 - ENG			6.00	4.55
0.394	Pre-roll	DivisionD - S - \$4.50 - ENG			4.50	1.77
0.08	Pre-roll	DivisionD_ML_8_DESKTOP			8.00	0.64
		IO#: 1/13/16 Campaign Name: VidRoll Preroll Flight Dates: 1/13/16-TBD Billing Data: VidRoll's Ad Server Sales Rep: Katie Duff Billing Range: 1/1-1/31/17				

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total	\$6,791.71
Payments/Credits	\$0.00
Balance Due in USD	\$6,791.71



DIVISION-D

906 Rain Forest Pkwy
Columbia, MO 65202
(573) 445-3083

INVOICE

104088

Bill to:

Accounts Payable Dept.
VidRoll
3110 Main St.
Suite 400
Santa Monica, CA 90405

Remit to:

Accounts Receivable Dept.
III-Interactive, LLC
dba Division-D
906 Rain Forest Pkwy
Columbia, MO 65202

Account #	IO No.	Flight Date	Rep	Terms	Invoice Date	Due Date
2015-0394	1/13/16	February	KE	60 Days	2/28/2017	4/29/2017
Quantity	Creative	Description			Rate	Cost
1.686	Mobile Preroll	DivisionD - mWeb - \$1.50 - US			1.50	2.53
0.979	Mobile Preroll	DivisionD - mApp - \$2 - US (FS)			2.00	1.96
0.429	Mobile Preroll	DivisionD - mWeb - \$2 - US			2.00	0.86
0.015	Mobile Preroll	DivisionD - mApp - \$2.50 - US (FS)			2.50	0.04
95.184	Pre-roll	DivisionD - \$9 - ENG (v2)			9.00	856.66
52.393	Pre-roll	DivisionD - M/L - \$9.50 - ENG (WL)			9.50	497.73
0.098	Pre-roll	DivisionD - \$7 - ENG			7.00	0.69
17.15	Pre-roll	DivisionD - \$5 - ENG			5.00	85.75
0.022	Pre-roll	DivisionD - S - \$3.50 - ENG			3.50	0.08
		IO#: 1/13/16 Campaign Name: VidRoll Preroll Flight Dates: 1/13/16-TBD Billing Data: VidRoll's Ad Server Sales Rep: Katie Duff Billing Range: 2/1-2/28/17				

ACH - WIRE INSTRUCTIONS
Bank: Commerce Bank
Account Name: Division-D
Account Number: 400678661
Routing Number: 101000019
Swift Code: CBKCUS44

Thank you for your business.

Total \$1,446.30

Payments/Credits \$0.00

Balance Due in USD \$1,446.30